

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

JAIME QUINN, an individual

Plaintiff,

Case No: 2:09-cv-161

v.

Hon. Robert Holmes Bell

PIPE & PILING SUPPLIES (U.S.A) LTD.,
a foreign profit corporation, and
RON GRIFFITH, an individual,

Defendants.

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MOTION TO ENTER AMENDED JUDGMENT
ON REMAND AND RELEASE SUPERSEADEAS BOND

Plaintiff, by her attorneys THE MACKRAZ LAW OFFICE, PC, moves this Court to enter amended judgment on remand and release superseadeas bond, stating as follows:

1. Following a jury verdict, this Court entered a Judgment in favor of Plaintiff consistent with that verdict.
2. After motion practice, the Court entered an Amended Judgment reducing the punitive damages award pursuant to the cap imposed by Title VII and apportioning it among Defendants Griffith and Pipe & Piling Supplies (U.S.A.) Ltd.
3. The Court awarded Plaintiff attorney fees as the prevailing party.

4. Defendants posted a superseadeas bond to cover the Judgment and Attorney Fees Award and stay collection proceedings.

5. Defendants appealed the Judgment and Order awarding attorney fees to the Sixth Circuit Court of Appeals.

6. The Sixth Circuit Court of Appeals affirmed in all respects, but remanded for clarification that:

7. The \$25,000 ELCRA damages portion of the Judgment applied against Defendant Ron Griffith; and

8. The \$50,000 punitive damages portion of the Judgment applied against Defendant Pipe & Piling Supplies (U.S.A.) Ltd.

9. Plaintiff moves this Court to enter an amended judgment pursuant to the Sixth Circuit's request for clarification and to release the superseadeas bond.

10. Plaintiff attempted to obtain concurrence from Defendants' counsel regarding the relief requested but was unable to obtain said concurrence.

WHEREFORE, Plaintiff respectfully requests this Court to enter an Amended Judgment per the direction of the Sixth Circuit Court of Appeals and to order transmission of the superseadeas bond to Plaintiff's counsel.

THE MACKRAZ LAW OFFICE, PC
Attorneys for Plaintiff

Date: March 5, 2013

By: /s/ Frederick E. Mackraz
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